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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROMAN LAFLECHE,

Defendant.

2:24-CR-019-JAD-BNW

**Preliminary Order of Forfeiture**

13       This Court finds Roman Lafleche pled guilty to Counts One and Two of a Two-  
14 Count Criminal Indictment charging him in Count One with possession of child  
15 pornography in violation of 18 U.S.C. § 2252A(a)(5)(B) and in Count Two with receipt or  
16 distribution of child pornography in violation of 18 U.S.C. § 2252A(a)(2). Criminal  
17 Indictment, ECF No. 1; Change of Plea, ECF No. 25; Plea Agreement, ECF No. 24.

18       This Court finds Roman Lafleche agreed to the forfeiture of the property set forth in  
19 the Plea Agreement, the Bill of Particulars, and the Forfeiture Allegation of the Criminal  
20 Indictment. Criminal Indictment, ECF No. 1; Bill of Particulars, ECF No. 5; Change of  
21 Plea, ECF No. 25; Plea Agreement, ECF No. 24.

22       This Court finds, under Fed. R. Crim. P. 32.2(b)(1) and (b)(2), the United States of  
23 America has shown the requisite nexus between property set forth in the Plea Agreement,  
24 the Bill of Particulars, and the Forfeiture Allegation of the Criminal Indictment and the  
25 offenses to which Roman Lafleche pled guilty.

26       The following property is any visual depiction described in 18 U.S.C. § 2252A, or  
27 any book, magazine, periodical, film, videotape, or other matter which contains any such  
28 visual depiction, which was produced, transported, mailed, shipped or received in violation

of 18 U.S.C. § 2252A(a)(2) and 2252A(a)(5)(B) and any property, real or personal, used or intended to be used to commit or to promote the commission of 18 U.S.C. § 2252A(a)(2) and 2252A(a)(5)(B) or any property traceable to such property and is subject to forfeiture under 18 U.S.C. § 2253(a)(1) and 2253(a)(3):

1. a Lenovo Laptop Computer, model number 81T2, serial number PF1K456L, with an Intel 256GB PCIe-NVMe Solid State Hard Drive (model SSDPEKKW256B, serial number BTHH84760PDM256B); and
  2. a Seagate BarraCuda 1TB Hard Drive (model ST1000LM049, serial number WGS5V38H)
- (all of which constitutes property).

This Court finds that on the government's motion, the Court may at any time enter an order of forfeiture or amend an existing order of forfeiture to include subsequently located property or substitute property under Fed. R. Crim. P. 32.2(e) and 32.2(b)(2)(C).

This Court finds the United States of America is now entitled to, and should, reduce the aforementioned property to the possession of the United States of America.

NOW THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the United States of America should seize the aforementioned property.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED all possessory rights, ownership rights, and all rights, titles, and interests of Roman Lafleche in the aforementioned property are forfeited and are vested in the United States of America and shall be safely held by the United States of America until further order of the Court.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED the United States of America shall publish for at least thirty (30) consecutive days on the official internet government forfeiture website, [www.forfeiture.gov](http://www.forfeiture.gov), notice of this Order, which shall describe the forfeited property, state the times under the applicable statute when a petition contesting the forfeiture must be filed, and state the name and contact information for the government attorney to be served with the petition, under Fed. R. Crim. P. 32.2(b)(6). Notice is served on any individual or entity on the date when it is placed in the mail,

delivered to a commercial carrier, or sent by electronic mail under Fed. R. Crim. P. 32.2(b)(6)(D) and Supplemental Rule G(4)(b)(iii)-(v).

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that any individual or entity who claims an interest in the forfeited property must file a petition for a hearing to adjudicate the validity of the petitioner's alleged interest in the property under 21 U.S.C. § 853(n)(2), which petition shall be signed by the petitioner under penalty of perjury under 21 U.S.C. § 853(n)(3) and 28 U.S.C. § 1746, and shall set forth the nature and extent of the petitioner's right, title, or interest in the property, the time and circumstances of the petitioner's acquisition of the right, title or interest in the property, any additional facts supporting the petitioner's claim, and the relief sought.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED a petition, if any, must be filed with the Clerk of the Court, 333 Las Vegas Boulevard South, Las Vegas, Nevada 89101, within thirty (30) days of the final publication of notice on the official internet government forfeiture site, [www.forfeiture.gov](http://www.forfeiture.gov), or his receipt of written notice, whichever is earlier.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED a copy of the petition, if any, shall be served upon the Asset Forfeiture Attorney of the United States Attorney's Office at the following address at the time of filing:

Daniel D. Hollingsworth  
Assistant United States Attorney  
Misty L. Dante  
Assistant United States Attorney  
501 Las Vegas Boulevard South, Suite 1100  
Las Vegas, Nevada 89101.


IT IS FURTHER ORDERED, ADJUDGED, AND DECREED the notice described herein need not be published in the event a Declaration of Forfeiture is issued by the appropriate agency following publication of notice of seizure and intent to administratively forfeit the above-described property.

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1 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Clerk send  
2 copies of this Order to all counsel of record.

3 DATED September 20, 2024.

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7 JENNIFER A. DORSEY  
8 UNITED STATES DISTRICT JUDGE  
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